October 23, 2008

President
Vertellus Specialties, Inc.
300 North Meridian Street, Suite 1500
Indianapolis, Indiana 46204-1763
Attn: John Jones, Director, Regulatory Management

Sent Via Email on October 22,2008

Regional Administrator
USEPA Region 5
Mail Code SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3507
Attn: Matthew Ohl

Director, Remediation
Site Remediation Section
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155
Attn: Nile Fellows

Subject: United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al.
File No. Civ. 4-80-469
Consent Decree – Remedial Action Plan (CD-RAP) Section 9.7
Prairie du Chien – Jordan Aquifer Gradient Control Plan

Gentlemen:

The City of St. Louis Park (the City) received comments from the United States Environmental Protection Agency and the Minnesota Pollution Control Agency (the Agencies) regarding the Prairie du Chien – Jordan Aquifer Gradient Control Plan in a letter dated September 23, 2008. The letter approved the plan with three modifications that are acceptable to the City.

The Agencies requested a revised schedule as a first step in implementing the plan, and that schedule is enclosed.

Any questions regarding this submittal can be directed towards this office.

Sincerely,

William M. Gregg

William M. Gregg
Project Leader for the
City of St. Louis Park

cc: Scott Anderson, City of St. Louis Park

Enclosure

Table 1 Revised Prairie du Chien - Jordan Aquifer Gradient Control Plan Schedule

Task	Task Description	Schedule	Task Lead	Projected Dates*
1	Equip PCJ wells with transducers	Within two months of Plan approval	City	23-Nov-08
2	Collect continuous water level data (Opportunities for PCJ aquifer tests)	For a duration of six months after Task 1	City	23-Nov-08 to 23-May-09
3	Utilize water level data to determine aquifer parameters, new model input, and PCJ impacts on shallower aquifers	One to two months after Task 2	City and Agencies	23-Jul-09
4	Conduct additional modeling runs and report	Two to four months after Task 2	City and Agencies	23-Sep-09
5	Assess modeling results and prepare recommendations for changing PCJ gradient control system, if needed	Within two months of the final modeling results	City	23-Jan-10
6	If modeling indicates that gradient control is not effective, design and install additional monitoring wells	Within two months of deciding to install wells (and Agencies' approval)	City	Spring 2010
7	If groundwater monitoring indicates a potential PAH problem in Edina, institute groundwater pumping at SLP6	Within one month. Other pumping scenarios could be considered, but SLP6 can be started up the quickest	City	Within one month of the receipt of the data

Agencies approved this plan on September 23, 2008